

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt Division)

In re: )  
GREGORY B. MYERS, ) Case No. 15-26033-MCR  
                        ) (Chapter 7)  
Debtor. )  
\_\_\_\_\_  
BRIAN KING, *et al.*, )  
                        )  
Plaintiffs, )  
                        )  
v. ) Adv. No.: 24-00007  
                        )  
ROGER SCHLOSSBERG, TRUSTEE, )  
                        )  
Defendant. )  
\_\_\_\_\_

**TRUSTEE'S RESPONSE TO DEBTOR'S SUGGESTION OF BANKRUPTCY**

TO THE HONORABLE MARIA ELLENA CHAVEZ-RUARK, UNITED STATES  
BANKRUPTCY JUDGE:

Roger Schlossberg, Chapter 7 Trustee of the Bankruptcy Estate of Gregory B. Myers (the “Trustee”), by his undersigned counsel, hereby submits this response to the *Suggestion of Bankruptcy* filed by the Debtor, Gregory B. Myers, [Dkt. # 25], which requests that all further proceedings in the above-captioned case be stayed, and respectfully states:

1. On March 24, 2025, the Debtor filed a motion requesting the voluntary dismissal of his Chapter 13 bankruptcy case in District of Columbia. *See In re Myers, Case No. 25-00069 (Bankr. D.D.C. 2025)* at Dkt. #29.
2. On March 26, 2025, the District of Columbia bankruptcy court entered an *Order Granting Dismissal and Retaining Jurisdiction* in which it granted the Debtor’s motion to dismiss

but retained jurisdiction to determine certain related pending motions. *Id.* at Dkt. #30. A copy of the *Order Granting Dismissal and Retaining Jurisdiction* is attached hereto as ***Exhibit 1***.

3. Among the issues still to be decided by the District of Columbia bankruptcy court are whether the dismissal of the Debtor's case "will be with or without prejudice," *id.*, and whether the court should "impose a bar to refiling in any bankruptcy court of no less than ten years after the order imposing the filing bar become final and non-appealable due to [the Debtor's] more than extraordinary abuse of the bankruptcy system" as set forth in a prior *Order to Show Cause* issued by the court. *Id.* at Dkt. #24. A copy of the *Order to Show Cause* is attached hereto as ***Exhibit 2***.

4. Given that the Debtor's District of Columbia bankruptcy case has been dismissed, the Debtor's request to stay the proceedings herein is now moot.<sup>1</sup>

WHEREFORE, the Trustee respectfully requests that the Court dismiss the Debtor's *Suggestion of Bankruptcy* and proceed to adjudicate the pending Rule 9019 motion.

Respectfully submitted,

SCHLOSSBERG | MASTRO

By: /s/ Frank J. Mastro  
Frank J. Mastro #24679  
Roger Schlossberg  
P.O. Box 2067  
Hagerstown, MD 21742  
(301) 739-8610  
[fmastro@schlosslaw.com](mailto:fmastro@schlosslaw.com)  
[rschlossberg@schlosslaw.com](mailto:rschlossberg@schlosslaw.com)  
*Attorneys for Roger Schlossberg, Trustee*

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<sup>1</sup> It is doubtful that the automatic stay from the Debtor's Chapter 13 case in the District of Columbia ever applied to this adversary proceeding as the Debtor is not a party herein and the proposed settlement between the Trustee and the King Plaintiffs does not concern any property of the Debtor's Chapter 13 estate in the District of Columbia.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the *3rd* day of *April 2025*, I served a copy of the *Trustee's Response to Debtor's Suggestion of Bankruptcy* (the “*Trustee's Response*”) upon all parties listed on the attached *CM-ECF Mailing Information*:

- (a) via electronic mail to those individuals included on the *Electronic Mail Notice List* at those email addresses noted thereon;
- (b) via first-class mail, postage prepaid, to those individuals included on the *Manual Notice List* as follows:

Gregory B. Myers  
700 Gulf Shore Blvd. North  
Naples, FL 34102  
*Debtor*

Additional copies of the *Trustee's Response* were sent via first-class mail, postage prepaid, to:

Office of the U.S. Trustee  
6305 Ivy Lane, Suite 600  
Greenbelt, MD 20770

/s/ Frank J. Mastro  
Frank J. Mastro